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**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEVADA**

CRAIG FARAH, Personal
Representative of the ESTATE OF
NICHOLAS FARAH,

Plaintiff,

vs.

LAS VEGAS METROPOLITAN
POLICE DEPARTMENT; RICHARD
NEWMAN; SAMUEL MENDOZA;
AARON MOSELY; JEREMY
STEWART; CHRISTY SNAPP;
GABRIEL VILLANUEVA; KIM SOFFE;
and COLLIN PETRIELIUS, and
NAPHCARE, INC.,

Defendants.

No. 2:20-cv-00604

Hon. Richard F. Boulware, II, Judge

Hon. Cam Ferenbach, Mag. Judge

**STIPULATION AND PROPOSED
ORDER EXTENDING DISCOVERY
SCHEDULE**

(Second Request)

Plaintiff Craig Farah, Personal Representative of the Estate of Nicholas
Farah, by and through his counsel of record, Defendants Las Vegas Metropolitan
Police Department, Richard Newman, Samuel Mendoza, Aaron Mosely, Jeremy
Stewart, Christy Snapp, Gabriel Villanueva, through their counsel of record, and

1 Kim Soffe, Colin Petrieli, and Naphcare, Inc., through their counsel of record,
2 hereby stipulate and agree that the discovery schedule as set out in the November
3 23, 2020 Stipulation and Order Extending Discovery Schedule (ECF 40) should be
4 extended by 90 days.

5 The instant filing is the second request for an extension of the Discovery
6 Schedule. The parties filed their Discovery Plan and Scheduling Order on August 3,
7 2020. ECF 21. They filed a subsequent stipulation extending the discovery
8 deadlines on November 23, 2020 (ECF 39), which was entered by the Court (ECF
9 40). The parties have moved forward diligently with both written and oral
10 discovery. The parties have served multiple third-party subpoenas and exchanged
11 substantial records and other relevant materials. The depositions of Plaintiff and
12 two Defendants are scheduled to take place in April.

13 Despite counsels' best efforts, more time is needed to complete discovery due
14 to delays caused by the COVID-19 pandemic, counsels' obligations in other matters,
15 the difficulties of locating witnesses, and the complexity of this case. Depositions of
16 the remaining parties and third-party witnesses need to be completed, and the
17 parties anticipate completing follow-up written discovery. Additionally, this Court
18 recently scheduled a hearing on the pending motion to dismiss filed by Defendants
19 Soffe, Petrieli, and Naphcare, Inc., for March 26, 2021. ECF 43. As such, the
20 parties ask the Court to extend discovery as follows:

- 21 a. The deadline for fact discovery will be extended from June 28, 2021 to
22 September 27, 2021.
- 23 b. The deadline to file motions to amend the pleadings or add parties will be
24 extended from March 30, 2021 to June 28, 2021.
- 25 c. The deadline for expert disclosures will be moved from April 27, 2021 to July
26 26, 2021, and the deadline for rebuttal experts will be moved from May 21,
27 2021 to August 19, 2021.

1 d. The deadline for the filing of dispositive motions will be moved from July 27,
2 2021 to October 25, 2021.

3 e. The deadline for filing the joint pretrial order will be moved from August 26,
4 2021 to November 24, 2021. As ordered previously, this deadline will be
5 suspended if dispositive motions are timely filed, until 30 days after the
6 decision of the dispositive motions or until further order of the Court. ECF
7 40.

8 Barring any other truly unforeseen, serious emergencies or unexpected
9 circumstances that would preclude completion of discovery, the parties do not
10 anticipate seeking any further extensions of discovery and, further, request that the
11 Court set a trial date based upon the schedule proposed herein.

12 The parties stipulate and agree to the requested extension. Accordingly,
13 Plaintiff and Defendants stipulate that the discovery schedule should be extended
14 by 90 days. This stipulation is made in good faith and not for the purpose of delay.

1 Dated this 22nd day of March, 2021.

2
3 By: /s/ Sarah Grady

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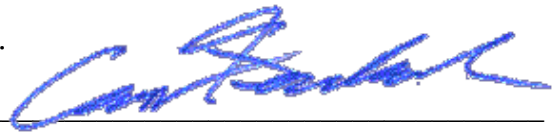
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ORDER

IT IS SO ORDERED that the above Stipulation is hereby GRANTED. The discovery schedule shall be extended by 90 days.

DATED this 22nd day of March, 2021.

A handwritten signature in blue ink, appearing to read "C. J. ...", is written over a horizontal line.

UNITED STATES MAGISTRATE JUDGE

CERTIFICATE OF SERVICE

I, Sarah Grady, an attorney, hereby certify that on March 22, 2021, I filed the foregoing Stipulation and Proposed Order via CM/ECF, which was electronically delivered to all counsel of record.

/s/ Sarah Grady
One of Plaintiff's Attorneys